

Vernette Walker
Plaintiff

v-

The News Journal and Ann Hines
Defendant

06-138-MPT

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 MAY 16 PM 12:51

Initial Disclosure

I. Individuals Likely to have Discoverable Information
which may be used to support my claim.

① Delores Pinto
The News Journal
950 Basin Road
New Castle, DE 19720

Ms. Pinto should have information relating to my
employment, leave, termination, benefits, letters of
appeal & return to work, policy & procedures, handbook

② Ann Hines
The News Journal
950 Basin Road
New Castle, DE 19720

Ms. Hines should have information relating to my
employment, leave, termination, benefits, letters of
appeal & return to work, policy & procedures, handbook

06-138-MPT

- ③ Shelly Rumpf
The News Journal
950 Basin Road
New Castle, DE 19720

Ms. Rumpf should have information relating to my annual appraisals, performance, decisions in her department to include (name & dates of new hires) in her department.

- ④ Dr. Linda Surdo
Concentra Medical Center
4110 Stanton-Ogletown Road
Newark, DE 19713

Ms. Surdo should have information relating to my my return to work evaluation / exam August 23, 2004.

- ⑤ Dr. Craig Sternberg
DE Back Pain & Rehab
200 Lea. Blvd.
Wilmington, DE 19802

Dr. Sternberg should have information relating to my medical condition and treatment from 1999-2005.

I ~~have~~ reserve my right to seek discovery from, and relating to, other persons that may become known (to include) News Journal employees - if applicable to my case) likely to have information relevant to disputed facts. In addition I reserve the right to designate and/or call additional

#06-138-MPT

Witnesses at trial.

Relevant Documents And Tangible Things

- ① Documents of communication with Ann Hines
- ② records of voice messages from Ann Hines & Shelly Rumpf
- ③ record of Concentra Medical Center return to work policy
- ④ Correspondence relating to Ann Hines personnel decision
- ⑤ My Medical records
- ⑥ Gannet benefits Manual
- ⑦ Documents From Community Legal Aid
- ⑧ Documents From Richard's Layton & Finger

Monday May 14, 2007

Vernette Walker
29 Richard Rd
New Castle, DE 19720
302-324-9175

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Certificate of Service

Initial Disclosure.

I hereby Certify that on May 16, 2007 a copy of the attached documents were filed with the Clerk of Court and hand delivered to

Jennifer C. Jauffret (Defendant Attorney)
Richards Layton & Finger
One Rodney Square
920 North King Street
Wilmington, DE 19801

Wesnette Walker
Pro-Se
29 Richard Rd
New Castle DE 19720
302-324-9175